

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SYLVESTER ALLEN, JR., *et al.*,

Plaintiffs,

v.

CITY OF GRAHAM, *et al.*,

Defendants.

1:20-cv-0997-CCE-LPA

**JOINT MOTION FOR STAY PENDING FINALIZATION AND
GOVERNMENTAL APPROVALS OF SETTLEMENT**

All Plaintiffs and Defendants to the above-captioned action (the “*Allen* Action”) (the “*Allen* Parties”) jointly move for the entry of the attached proposed Order for a stay of the *Allen* Action pending the finalization and governmental approvals of the settlement reached between them during a mediation held on May 10, 2021. In support of this Motion, the *Allen* Parties state as follows:

1. On May 10, 2021, the *Allen* Parties participated in an attorneys-only mediation before mediator Thomas C. Duncan.
2. Through the mediation, the *Allen* Parties agreed upon terms to settle all claims in the *Allen* Action.
3. The May 10, 2021 mediation and settlement was between the *Allen* Parties only and does not impact the claims in *Drumwright, et al. v. Cole, et al.*, 1:20-CV-00998, which was consolidated with the *Allen* Action.
4. The *Allen* Parties are now working towards a final settlement agreement to

resolve the *Allen* Action. This final settlement agreement also will require approvals from the City Council for the City of Graham and the Alamance County Board of Commissioners.

5. Accordingly, the *Allen* Parties respectfully seek a stay of the *Allen* Action pending the finalization and governmental approvals of their final settlement agreement. The *Allen* Parties also propose to submit a joint status report to the Court regarding such finalization and governmental approvals no later than July 23, 2021.

6. A proposed Order is submitted with this Motion.

WHEREFORE, the *Allen* Parties respectfully move for a stay of the *Allen* Action pending the finalization and governmental approvals of their final settlement agreement.

Dated: May 20, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day filed the foregoing ***Joint Motion for Stay Pending Finalization and Governmental Approvals of Settlement*** with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to the following attorneys of record in the consolidated actions:

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Dated: May 20, 2021

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